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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF GOOGLE'S  
ADMINISTRATIVE MOTION TO SEAL  
RESPONSES AND OBJECTIONS TO  
SPECIAL MASTER'S REPORT AND  
ORDERS ON REFERRED DISCOVERY  
ISSUES**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s  
7 Administrative Motion to Seal portions of Google’s Responses and Objections to Special Master’s  
8 Report and Orders on Referred Discovery Issues (Dkt. 299) (the “Objection”) and supporting  
9 documents. In making this request, Google has carefully considered the relevant legal standard and  
10 policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the good  
11 faith belief that the information sought to be sealed consists of Google’s confidential and proprietary  
12 information and that public disclosure could cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the  
14 Opposition and Exhibits 1-4 to the Opposition in their entirety.

15 4. The information requested to be sealed contains Google’s highly confidential and  
16 proprietary information regarding highly sensitive features of Google’s internal identifiers, projects,  
17 data structures, and data usage policies related to its products and services, that Google maintains  
18 as confidential in the ordinary course of its business and is not generally known to the public or  
19 Google’s competitors.

20 5. Such confidential and proprietary information reveals Google’s internal strategies,  
21 system designs, and business practices for operating and maintaining many of its important services,  
22 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-  
23 3.

24 6. Public disclosure of such confidential and proprietary information could affect  
25 Google’s competitive standing as competitors may alter their systems and practices relating to  
26 competing products. It may also place Google at an increased risk of cyber security threats, as third  
27 parties may seek to use the information to compromise Google’s identifier and log systems and  
28 practices.

7. For these reasons, Google respectfully requests that the Court order the Opposition and Exhibits 1-4 to the Opposition to be filed under seal.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on October 27, 2021.

DATED: October 27, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Jonathan Tse  
Jonathan Tse

*Attorney for Defendant*